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Attorney for Proposed Intervenors

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA  
 WESTERN DIVISION—LOS ANGELES**

YITZCHOK FRANKEL, ) Case No. 2:24-cv-04702-MCS-  
 JOSHUA GHAYOUM, )  
 EDEN SHEMUELIAN, and )  
 DR. KAMRAN SHAMSA )

Plaintiffs, )

vs. )

REGENTS OF THE UNIVERSITY OF ) **DECLARATION OF ROE 5 IN**  
 CALIFORNIA; MICHAEL V. DRAKE, ) **SUPPORT OF MOTION FOR**  
 President of the University of California; ) **LEAVE TO INTERVENE**  
 GENE D. BLOCK, Chancellor, University )  
 of California, Los Angeles; DARNELL )  
 HUNT, Executive Vice-President and )  
 Provost; MICHAEL BECK, )  
 Administrative Vice Chancellor; )  
 MONROE GORDEN, JR., Vice )  
 Chancellor; and RICK BRAZIEL, )  
 Assistant Vice Chancellor, each in both )  
 his official and personal capacities, ) **Judge: Hon. Mark C. Scarsi**

Defendants. )

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2 I, ROE 5, declare as follows:

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4 1. This declaration is submitted in support of Proposed Intervenor's Motion  
5 for Leave to Intervene.

6 2. I am over the age of 18 and am capable of making this declaration  
7 pursuant to 28 U.S.C. § 1746. I have personal knowledge of all of the contents of this  
8 declaration.

9 3. I was born in the United States and am of Palestinian and Lebanese  
10 descent.

11 4. I was raised in a Christian family in a largely Muslim neighborhood in  
12 Beirut.

13 5. I returned to the U.S. at the end of high school and attended college in  
14 the U.S.

15 6. After graduating from college, I received my PhD from Duke University  
16 and taught for a decade at the University of Chicago.

17 7. I have been a faculty member at UCLA since 2003.

18 8. I write on Palestine and have published articles and books in the  
19 academic and popular press on the topic.

20 9. I am deeply concerned about and have an interest in the court's  
21 conflation of anti-Zionism with antisemitism in the Frankel case.

22 10. I am concerned that if the Plaintiffs are successful, criticism of Zionism  
23 and of the state of Israel's apartheid policies and genocide will stand as a form of  
24 anti-Jewish hate speech and therefore be banished from classes, readings, textbooks,  
25 assignments, lectures, debates, conferences, and forums on campuses at UCLA and  
26 across the United States.

27 11. In addition, I am deeply concerned about the hostile environment  
28 adopting this definition will create. I have personally experienced this hostility at

1 UCLA. I keep a poster in my office that simply states “Teach Palestine”. This poster  
2 was ripped down while I was in the office. If I can’t even have a poster that says  
3 “Teach Palestine”, how can anyone teach Palestine at UCLA?

4 12. I was in the Palestine Solidarity Encampment and never saw anyone  
5 prevented from entering on the basis of their faith. I saw safety measures increase  
6 directly in response to the violence of counterprotesters, many of whom called  
7 themselves Zionists. When I approached the encampment, I was denied entry until  
8 they found someone to vouch for me.

9 13. I oppose genocide and the rise and normalization of fascism here and  
10 abroad, including in the State of Israel.

11 14. I have an interest in free speech and academic freedom.

12 15. I condemn the efforts to victimize and stigmatize pro-Palestinian  
13 students and student associations supporting Palestinian advocacy.

14 I declare under penalty of perjury under the laws of the United States that the  
15 foregoing is true and correct. Executed this 2<sup>nd</sup> day of May, 2025, at Los Angeles,  
16 California.

17 /s/ Roe 5

18 Roe 5  
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